

### REMARKS

Claims 1-17 are pending in the present application. Claims 1-17 have been rejected by the Examiner.

Claims 1-12, 14 and 17 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Wong (U.S. Patent N. 6,260,021) in view of Moshfeghi (U.S. Patent No. 6,076,166). The Examiner asserts that Wong discloses all of the elements recited in claim 1 of the present application except for RIS and PACS databases residing on a database server. The Examiner asserts that Moshfeghi provides this element. However, focusing at least initially on Wong, the Applicant respectfully rebuts the Examiner's assertion.

For example, claim 1 of the present application recites, among other things, a database engine residing on the database server to manage the RIS database and the PACS database by providing a *brokerless interface* between the RIS database and the PACS database. The present application explains that a broker translates information, such as HL7 information, from a RIS system to a format that a PACS system understands. Here, the presently claimed system eliminates the broker to provide integration without such translation between the RIS and PACS systems. *See, e.g.*, para [0033] of the present application.

In contrast, Wong explicitly describes not only one but several brokers in its systems with a RIS and a PACS. The "invention" of Wong is described as being implemented according to the CORBA family of standards (the Common Object Request **Broker** Architecture). Col. 6, ll. 2-64; col. 9, ll. 34-63. Turning to Fig. 1, the system includes 10 includes a "CORBA Image Interface Engine ("CIIE") 32, which interfaces between the PAC system and medical image server 12." Fig. 1, col. 7, ll. 38-58. Additionally, the RIS 18 is attached to a "CORBA Report Interface Engine ("CRIE") 24, which performs a similar function for the RI system as CIIE 32 performs for the PAC system." Col. 7, ln. 59 – col. 8, ln. 14; *see also* CIIE 32, CRIE 24 and object request broker 52 of Fig. 2. As referenced by the Examiner, Wong in fact discloses that both the PACS and the RIS have associated interface engines "in order to match each system's unique interface definition to the uniform object interfaces defined in the medical image

server." Col. 8, ll. 15-30. Thus, Wong discusses a *broker-driven*, rather than *broker-less* system. Moshfeghi does nothing to cure that defect.

Accordingly, for at least the reasons given above, the Applicant submits that claims 1-17 are allowable over Wong in view of Moshfeghi. Action to that effect is respectfully requested.

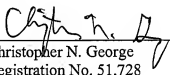
Claims 13 and 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Wong and Moshfeghi further in view of Crane (U.S. Patent No. 5,748,907). Crane discloses neither a PACS nor a RIS. Further, Crane discloses nothing regarding a database engine providing a brokerless interface between a PACS and a RIS. Thus, the disclosure of Crane does nothing to cure the deficiencies of Wong and Moshfeghi with respect to independent claim 1, from which claims 13 and 16 depend. Therefore, the Applicant respectfully submits that claims 13 and 16 should also be allowable.

Claim 15 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Wong and Moshfeghi further in view of Segal (U.S. Pat. Pub. No. 2001/0041991A1). However, Segal does not disclose a system with both a PACS and a RIS. Further, Segal discloses nothing regarding a database engine providing a brokerless interface between a PACS and a RIS. Thus, the disclosure of Segal also does nothing to cure the deficiencies of Wong and Moshfeghi with respect to independent claim 1, from which claim 15 depends. Therefore, the Applicant respectfully submits that claim 15 should also be allowable.

The prior art made of record but not relied upon by the Examiner in rejecting claims 1-17 also fails to teach or suggest all of the limitations recited in the pending claims at least because none of the cited references discloses a brokerless interface between a PACS and a RIS.

The Applicant submits that the claims of the present application define allowable subject matter. If the Examiner has any questions or if the Applicant can be of any assistance, the Examiner is invited and encouraged to contact the Applicant at the number below. The Commissioner is authorized to charge any necessary fees or credit any overpayment to the Deposit Account of GEMS-IT, Account No. 502401.

Respectfully submitted,

  
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Christopher N. George  
Registration No. 51,728  
Attorney for Applicant

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McAndrews, Held & Malloy, Ltd.  
500 West Madison Street, 34th Floor  
Chicago, Illinois 60661  
Telephone: (312) 775-8000  
Facsimile: (312) 775-8100